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Hearing Date: March 31, 2011
Time: 2:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

LEHMAN BROTHERS HOLDINGS INC., et al., Case No.: 08-13555 (JMP)

Debtors.
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**OBJECTION OF INVERELL SHIRE COUNCIL TO
DEBTOR'S NINETY-SECOND OMNIBUS OBJECTION
TO CLAIMS (NO BLOCKING NUMBER LPS CLAIMS)**

Secured Creditor Inverell Shire Council ("Inverell"), by and through its undersigned counsel, submits the following in support of its objection to the motion of Chapter 11 Debtor, Lehman Brothers Holdings Inc. ("Debtor"), for an order to reduce, modify, disallow and/or expunge the claim of Inverell ("Motion"):

1. On September 18, 2009, Inverell filed a Proof of Claim in the above-referenced bankruptcy pursuant to the terms set forth in the order that established the deadline for filing proofs of claim dated July 2, 2009. A copy of Inverell's Proof of Claim as filed is annexed hereto and made a part hereof as Exhibit A.

2. In February 2011, Inverell was advised that there was a problem with its Proof of Claim by Notice of Hearing on Debtors' Ninety-Second Omnibus Objection to Claims (No Blocking Number LPS Claims).

3. The Motion provides that the "claim violates the Bankruptcy Court's July 2, 2009 order setting forth the procedures and deadlines for filing proof of claim in these chapter 11 cases (the "Bar Date Order") [Docket No. 4271] as it does not include an electronic instruction reference number or a blocking reference number as required by a Bar Date Order."

4. According to the objection, the Proof of Claim filed by Inverell is valid, save for failing to include an electronic instruction reference number.

5. The relevant electronic instruction reference number pertaining to Inverell's claim is Austraclear Series ID LBTG02.

6. Inverell hereby seeks to amend its Proof of Claim to include the above mentioned electronic ID. A proposed amended Proof of Claim, including the Austraclear Series ID is annexed hereto and made a part hereof as Exhibit B.

7. It is submitted that leave should be granted to amend the Proof of Claim as "[a]mendment to a claim is freely allowed where the purpose is to cure a defect in the claim as originally filed." See In Re Enron Corp., 419 F.3d 115, 133 (2d Cir. 2005).

WHEREFORE, for the foregoing reasons, Inverell Shire Council respectfully requests that the Court deny the Debtor's Objection to Claim as to its Proof of Claim on the grounds that the Proof of Claim is valid and the amendment required is nominal.

Dated: Melville, New York
March 16, 2011

LAZER, APTHEKER, ROSELLA
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By: /s/ Joseph C. Savino, Esq.
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